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Attorneys for Plaintiff Antonio S. Camacho

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

ANTONIO S. CAMACHO) CIVIL CASE NO. 05-0043

Plaintiff,

VS.

**COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS,
DEPARTMENT OF PUBLIC LANDS,
successor to the Marianas Public Lands
Authority, and DEPARTMENT OF
PUBLIC WORKS,**

) CIVIL CASE NO. 05-0043

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) DECLARATION OF MICHAEL W.
)) DOTT IN FURTHER SUPPORT OF
)) MOTION FOR WRIT OF EXECUTION
)) OR ORDER IN AID OF JUDGMENT

No Hearing Requested

I, Michael W. Dotts, hereby declare and state, under the penalty of perjury, and based on personal knowledge unless otherwise stated, as follows:

1. Defendants cite to the “payment of a judgment” in *Atalig v. Rota Municipal Council*, Civ. No. 04-0021, in the amount of \$305,000 as support for their argument that Defendants do pay judgments. I was counsel for plaintiffs in *Atalig*. The actual judgment was \$390,076.41. On appeal plaintiffs settled the case for \$305,000 in part so that they would get paid quicker. The settlement took place in January, 2007, but the Defendants did not fully pay the *settlement* until late March, 2008.

2. Defendants also point to a payment of about \$256,000 to a different Mr. Camacho. I have some familiarity with that case. The judgment amount is for \$800,000 and has been outstanding for several years. Defendants paid less than \$300,000 on that judgment only because that Mr. Camacho was dying and his family went to the Legislature to beg.

3. On about September 5, 2008, Governor Filial signed into law a \$4,750,000 appropriation bill. That bill did not appropriate any money to pay any of the approximate 12 judgments that have been entered against the Commonwealth. Instead, here are some of the highlights of what money was appropriated for:

\$45,000 – 2009 Liberation Day Activities;

\$50,000 – CNMI Little League;

\$25,000- Fishing Derby;

\$20,000- Agricultural Fair;

\$15,000 – Flame Tree Festival;

\$30,000 – A&E for Benavente Baseball Field;

\$100,000 – Pavilion construction and children's playground equipment;

\$10,000 – Improvement at Pakpak Beach Park;

\$15,000 - Northern Islands field trip (?);

\$5,600 - to MCV for Chamorro Language programming;

\$20,000- Construction of covered walkways at Oleai Elementary School;

\$21,000 – Northern Mariana Islands Museum of Culture and Arts;

\$20,000- Tanita scales (measure body fat) for the Public School System;

\$25,000 – Paving of parking area at Pakpak Beach Park; and

\$5,000 – Chief Aghurubw celebration.

\$406,000

I, Michael W. Dotts, declare and state under penalty of perjury that the foregoing is true and correct, and if called upon to testify, I would competently testify thereto.

Executed on this 11th day of September, 2008 in Saipan, CNMI.

/s/
MICHAEL W. DOTTTS, ESQ.